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Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**OREGON NATURAL DESERT
ASS'N,**

Case No. 3:09-cv-00369-PK

Plaintiff,

**DECLARATION OF SEAN
E. MARTIN**

v.

**BRENDAN CAIN, Burns District
Manager, Bureau of Land
Management, *et al.*,**

Defendants,

and

HARNEY COUNTY,

Defendant-Intervenor.

I, Sean E. Martin, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. I am an Assistant United States Attorney, and I serve as counsel of record for Defendants in this matter. I have personal knowledge of the facts set forth below.
2. The government incurred costs for formatting and preparing the initial Administrative Record covering the Bureau of Land Management's challenged 2007 Steens Travel Management Plan ("TMP") decision and the Interior Board of Land Appeals' challenged 2009 decision on review of the TMP decision. This Administrative Record comprised 13,479 pages. *See* ECF 22 (showing page range of this Administrative Record). The government's September 2009 invoice, attached to its cost bill, indicates it incurred costs of \$3,036.83 for formatting and preparing this 13,479-page record for judicial review.
3. The government also incurred costs for formatting and preparing the Administrative Record for the Interior Board of Land Appeals' challenged 2014 decision on remand from this Court. This Administrative Record comprised 22,350 pages, *See* ECF

215 (showing page range of this Administrative Record). The government's January 2015 invoice, attached to its costs bill, indicates it incurred costs of \$1,888.16 for formatting and preparing this 22,350-page record for judicial review.

4. Defendants are declining to seek their Administrative Record costs with regard to the Bureau of Land Management's challenged 2015 Comprehensive Recreation Plan decision.

Dated this 27th day of February, 2018.

/s/ Sean E. Martin
SEAN E. MARTIN